BEFORE THE POSTAL RATE COMMISSION WASHINGTON, D.C. 20268-0001

RECEIVED

May 10 10 51 AM '00

POSTAL RATE AND FEE CHANGES, 2000

POSTAL RATE COMMISSION OFFICE OF THE SECRETARY Docket No. R2000-1

INTERROGATORIES OF THE DIRECT MARKETING ASSOCIATION, INC. TO USPS WITNESS O'TORMEY

Pursuant to Sections 25 and 26 of the Commission's Rules of Practice, the Direct Marketing Association, Inc. hereby submits the attached interrogatories to USPS witness O'Tormey: DMA/USPS-ST42, Nos. 1-4. If the designated witness is unable to respond to any interrogatory, we request a response by some other qualified witness.

Respectfully submitted,

Dana T. Ackerly II, Esq. COVINGTON & BURLING 1201 Pennsylvania Avenue, N.W. Washington, D.C. 20004-2401 (202) 662-5296

Counsel for the Direct Marketing Association, Inc.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document in accordance with Section 12 of the Commission's Rules of Practice.

Dana T. Ackerly II

Dated: May 10, 2000

DMA/USPS-ST42-1. In response to MPA/USPS-ST42-4, you provide Periodicals savings related to changes in mail preparation.

- (a) Will there be savings for any other classes or subclasses based on the preparation changes you describe?
- (b) If so, please provide an electronic spreadsheet showing the savings by class and subclass as well as institutional savings.

DMA/USPS-ST42-2. In response to MPA/USPS-ST42-8, you provide Periodicals and total savings for better performance from the AFSM 100s than was expected. Please provide an electronic spreadsheet showing these additional savings by class and subclass as well as the savings in institutional cost.

DMA/USPS-ST42-3. In response to MPA/USPS-ST42-9, you provide Periodicals and total savings for new equipment beyond what was covered in LR-I-126. Please provide an electronic spreadsheet showing the savings by class and subclass as well as the savings in institutional cost.

DMA/USPS-ST42-4. In response to MPA/USPS-ST42-10, you provide Periodicals and Standard A savings, which will occur from reduced bundle breakage. If other classes and subclasses will also save costs from reduced bundle breakage, please provide an electronic spreadsheet showing the savings by class and subclass as well as savings in institutional cost.